

INTEGRATED SAFETY MANAGEMENT DESCRIPTION

ENVIRONMENT, SAFETY, AND HEALTH DIVISION

ESH-QMP-PP-05 (REV 0)

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Los Alamos
NATIONAL LABORATORY


Operated by the University of California
For the U.S. Department of Energy

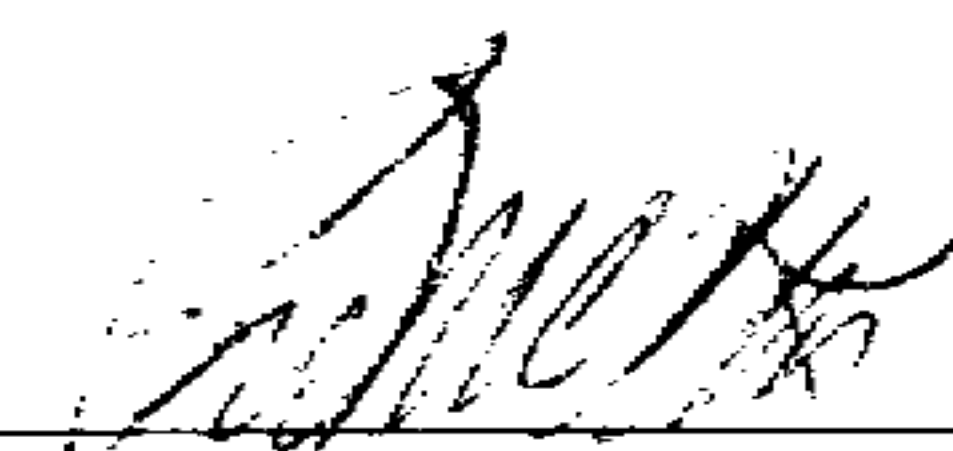
APPROVAL

The Integrated Safety Management description for the Environment, Safety, and Health Division is submitted to the Deputy Laboratory Director for Operations for review and concurrence by the Laboratory Senior Executive Team. The ESH Division ISM Description has been prepared in accordance with the *Format and Content Guide for Organizational ISM Descriptions* (ISM Program Office, January 19, 1999). This ISM Description is a work product of ESH Division and represents the efforts of numerous members. It is expected to be a "living document" at the detail level. Minor updates to the description will be made at the discretion of the ESH Division Director. Major revisions will be resubmitted for institutional approval. Annual reviews and revisions are anticipated.

Approval


Dennis J. Erickson
ESH Division Director


Date


J. Lee McAtee
ESH Deputy Division Director

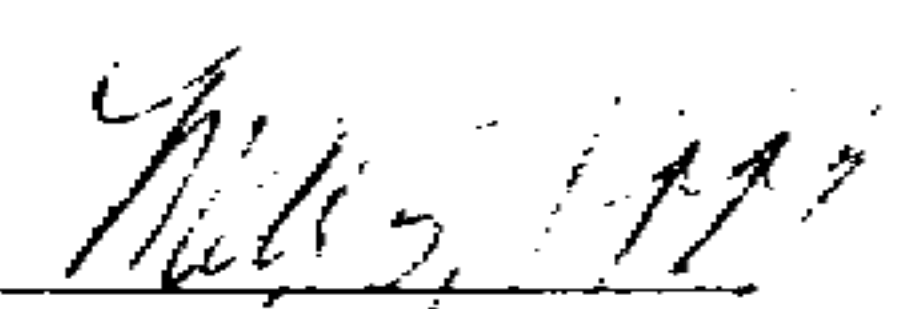

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1.0 PURPOSE

The Integrated Safety Management Description for the Environment, Safety, and Health Division provides tailored expectations and targeted actions to achieve sustained implementation of ISM. The basis for the ESH Division Description is the Laboratory ISM Description contained in LA-UR-98-2837. Completion of the actions in this plan are expected to give ESH Division members, Laboratory managers and customers, the Department of Energy, University of California, regulators, and stakeholders increased confidence that ISM is implemented. Effective implementation of ISM will ensure an ES&H culture that strives for excellence in the protection of our workers, the public, and the environment. The Description is explicit to the mission and work processes of ESH Division.

2.0 APPLICABILITY

The ISM Description for ESH Division is applicable to all personnel working for the division. This includes ESH Division employees, staff deployed to ESH Division from other Laboratory organizations, subcontractors, students, visitors, and affiliates. These individuals are termed members of ESH Division. The division consists of groups, offices, and programs. The Description generically refers to these various organizations as groups.

3.0 KEY OBJECTIVES

3.1 Worker Involvement

The actions in this Description are intended to strengthen involvement of division members in improving our ES&H culture. ESH Division commits to the creation of interlocking ES&H committees as a principle means for involvement and communication. The division additionally commits to establishing new mechanisms for the participation of its members in formulating and exercising plans, goals and objectives, and measures. These mechanisms also provide increased involvement in the development and review of Laboratory requirements. A complementary action commits the division to pilot a behavior-based safety initiative. These actions are further intended to internalize safety as a personal value in the members of the division.

3.2 Communication

This Description establishes explicit expectations for the members of ESH Division. Managers will communicate to members the Laboratory's ES&H policy, the Laboratory ISM Description, and the ESH Division ISM Description. The Description defines actions for annual ISM discussions with all ESH Division employees, new-hire orientations, and the development and distribution of an ES&H Handbook. The Description commits to comprehensive sharing with division members of ES&H performance goals and data. The Description also commits to involvement of workers in tracking, trending, and analyzing the operational performance of the division.

4.0 DOCUMENT CONTENT

This ISM Description comprises the plan of the Environment, Safety, and Health Division to fully integrate ES&H excellence with its work. It provides a key process plan anticipated by the ESH Division Quality Management Plan. This description is not intended as a detailed implementation plan, and fully assumes the detail and requirements found in other Laboratory ISM documents. The balance of this document provides specific expectations and actions to attain ISM implementation in ESH Division and to achieve key objectives for worker involvement and communication.

5.0 MANAGEMENT COMMITMENT TO INTEGRATING SAFETY WITH WORK

5.1 Safety Policy

Laboratory Expectation

The Laboratory ISM Description (LA-UR-98-2837) establishes the Laboratory's safety management system for doing work while protecting workers, the public, and the environment. The ISM Description (Page 5) provides the Laboratory ES&H policy that establishes the highest-level values and objectives.

ESH Division Expectation

Division members understand the Laboratory's ES&H Policy.

Division members have a general understanding of ISM, including the guiding principles, core functions, and roles and responsibilities.

Division members have mechanisms for discussing and clarifying the intent and purpose of safety initiatives; for raising and resolving ES&H issues; and for contributing to ES&H "process" improvements. Such mechanisms are used to achieve ES&H excellence in the performance of work.

ESH Division Actions

Ongoing

- 1. The division operates in accordance with the Laboratory's ES&H Policy, and uses the ISM Description to conduct its work.*
- 2. The division communicates and reinforces the Laboratory's ES&H Policy, the Laboratory ISM Description, the Division's mission and objectives using its internal newsletter (ESH Division Communications) and other communication mechanisms on a regular basis.*
- 3. Managers begin all meetings with a Safety First discussion.*
- 4. The division and its members participate in the Laboratory Annual Safety Days.*

New

- 1. Managers will review and discuss the Laboratory ES&H Policy, the Laboratory ISM Description, and the ESH-Division ISM Description with all members on an annual basis.*

2. *The division will establish nested and interlocking ES&H committees with direct participation by managers. Committees will be established at both division and group levels. Leadership of group committees will provide members for the division-level committee. Committee memberships will be established to provide broad, representative interactions and communications across all organizational levels.*
3. *Managers will provide organization-specific ES&H orientations to all new members.*
4. *The division will develop and distribute to all members a division handbook for ES&H.*

5.2 Goals and Objectives

Laboratory Expectation

A major element of ISM is performance assurance. Performance assurance includes the establishment of goals and objectives to foster continuous improvement, at the institutional level (i.e., Appendix F) and locally as required.

ESH Division Expectation

The division uses plans, goals and objectives, and measures, as appropriate, to assure safe operations and to strive for ES&H excellence. These tools are developed by division members; derive from and support institutional-level plans, goals and objectives, and measures; are clearly communicated to members who have involvement in meeting a goal, objective, or measure; and are routinely tracked by managers.

ESH Division Actions

Ongoing

- 1. The division tracks and acts to achieve performance relative to Appendix F ES&H measures and other ES&H goals and objectives.*
- 2. Managers and members focus performance relative to established ES&H goals and objectives in Individual Performance Plans.*

New

- 1. The division will complete and implement a Quality Management Plan as the framework for operations.*
- 2. The division will develop division- and group-specific ES&H goals, objectives, and measures beyond Appendix F and other institutional measures.*
- 3. Groups will use their ES&H committees to involve members in developing and tracking ES&H goals, objectives, and measures.*
- 4. Managers will develop and use tools as appropriate to actively track plans, goals and objectives, and measures.*
- 5. Division and Laboratory ES&H performance, including information about specific events, will be broadly communicated to members.*

5.3 Injury and Incident Investigation

Laboratory Expectation

An ISM expectation is that all injuries and incidents are reviewed or investigated. To be effective in improving safety in their organization's safety performance, line managers and supervisor need to participate in these investigations.

ESH Division Expectation

Division managers and supervisors are directly involved in investigation and development of corrective actions for recordable injuries, reportable occurrences, and environmental violations.

Division members are informed and involved in tracking, trending, and analyzing their organization's collective incident experience.

ES&H committees inform organization members of corrective actions and lessons learned.

ESH Division Actions

Ongoing

- 1. Division-level managers interview all members involved in recordable injuries.*
- 2. Group-level managers investigate and assure development of corrective actions for recordable injuries.*

New

- 1. Division organizations will use their ES&H committees to track, trend, and analyze their collective incident experience. The ES&H committees will also inform their organizations of corrective actions and lessons-learned.*
- 2. Managers will expand their involvement for review and investigation to recordable injuries, occurrences, and environmental violations.*

5.4 Integrated Organization for ES&H Excellence

Laboratory Expectation

ISM establishes high-level roles and responsibilities for technical, program, facility, and service organizations.

ESH Division Expectations

Managers ensure that resources are sufficient to perform work safely.

Members can identify and access ES&H resources through their facility ES&H team leader, the division or group ES&H Officers, and the division web ES&H resource listing.

The division assures students and other occasional workers are appropriately trained and informed as to their ES&H duties and responsibilities.

ESH Division Actions

Ongoing

- 1. The division uses facility-tenant agreements (FTAs) and service agreements to address roles and responsibilities, resources, communication, conflict resolution, and other areas important to operational coordination across different organizations.*
- 2. The division uses its formalized student program to provide effective mentorship, student orientation, and appropriate communication regarding safe performance of work.*

New

- 1. The division will strengthen FTAs and service agreements to improve their use as mechanisms for defining organizational relationships and ES&H support.*
- 2. Managers will assign division- and group-level ES&H Officers to serve as organizational points-of-contact for identifying and accessing ES&H resources.*
- 3. The division will use its Quality Management Plan to more formally define and communicate our ES&H roles and responsibilities.*
- 4. Managers will communicate to all members ES&H roles and responsibilities and mechanisms for identification and access of ES&H resources through annual ISM presentations, the ES&H Handbook, and new-hire orientations.*
- 5. The division will expand opportunities for open exchanges regarding ES&H issues.*

6.0 SUSTAINED EXECUTION OF RELEVANT INSTITUTIONAL ES&H REQUIREMENTS

6.1 LPR/LIR Implementation

Laboratory Expectation

ISM is a standards-based system where Laboratory-wide requirements are established and implemented in the workplace.

ESH Division Expectation

ESH Division activities are performed in accordance with contractual standards and Laboratory requirements (LPRs and LIRs).

ESH Division Actions

Ongoing

- 1. Each group identifies applicable requirements and provides timely certification of implementation in accordance with ESH-QMP-PP-02, LIR Implementation.*
- 2. Assessment of LIR implementation is a routine part of Management Walk-Arounds.*

New

- 1. ES&H committees will be used for evaluating new and revised requirements, notices, and alerts. Evaluation will be used to clarify intent and applicability and to identify issues. The ES&H committees will also assist in identifying implementation actions and communicating them to relevant workers.*
- 2. Conformance to standards, requirements, and other established expectations will be routinely evaluated in the review and investigation of recordable injuries, occurrence investigations, and environmental violations.*

6.2 Requirement Development and Improvement

Laboratory Expectation

Institutional expectations are created by review of Laboratory work and flow back as requirements for facilities and activities.

ESH Division Expectation

Members are involved in developing and improving Laboratory standards and requirements based on their work.

ESH Division Actions

Ongoing

- 1. The division point-of-contact (POC) for Laboratory requirements ensures that impacted organizations and workers are informed of pending development and revision of requirements (LPRs and LIRs).*
- 2. The division coordinates the development and review of Laboratory requirements in accordance with ESH-QMP-PP-04, LIR Development, to assure quality, timeliness, stakeholder review, and effective comment resolution.*

New

- 1. ES&H committees will be used to communicate member concerns relating to requirements.*
- 2. The division POC will use as appropriate intergroup/intradivision focus teams of workers to review proposed LIRs.*
- 3. During annual presentations of this ISM Description, in the ES&H Handbook, and as part of new-hire orientations, division members will be encouraged to provide feedback to OICs for continual requirement improvement.*

7.0 SAFE PERFORMANCE OF WORK

7.1 Facility Work

Laboratory Expectation

As part of ISM, the Laboratory has established institutional requirements for facility work.

ESH Division Expectation

Division members understand the definition of facility work, are knowledgeable of the relevant requirements of their Facility-Tenant Agreements (FTAs), and know how to initiate facility work.

All facility work requested or performed by division members is accomplished in accordance with LIR 230-03-01, *Facility Work Control*.

Note: ESH Division is the landlord/owner of FMU 71. Day-to-day aspects of the management of FMU 71, including Facility Work Control, is conducted in accordance with a Memorandum of Agreement. ESH Division also has facility-tenant agreements with ten other FMUs.

ESH Division Actions

Ongoing

- 1. Division members coordinate all facility work with the relevant FMU to ensure compliance with LIR 230-03-01.*
- 2. Division-level management maintains knowledge of facility work control performance for FMU 71, including tracking work control performance measures, goals and objectives, and assessment findings, and takes appropriate actions to address issues.*

New

- 1. Managers will communicate to all members the definition of facility work and the requirements of relevant FTAs through annual ISM presentations, the ES&H Handbook, and new-hire orientation.*
- 2. The facility manager for FMU 71 will be a member of the division ES&H committee.*

7.2 Non-Facility Work (R&D, Office, and Other)

Laboratory Expectation

As part of ISM, the Laboratory has established institutional requirements for safe work practices.

ESH Division Expectation

All programmatic work is conducted in accordance with LIR 300-00-01, *Safe Work Practices*, and with safety envelopes as defined by Facility Safety Plans and FTAs.

Affected members are directly involved in evaluating work and controls, developing hazard control plans, and determining worker qualification and training requirements.

The division maintains a formal process by which groups inventory work activities, identify and evaluate hazards, develop controls, and authorize work and workers.

ESH Division Actions

Ongoing

- 1. Managers ensure programmatic work is conducted in accordance with LIR 300-00-01.*
- 2. Groups maintain inventories of work activities.*
- 3. Managers routinely assess SWP implementation and related HCPs during Management Walk-Arounds.*

New

- 1. The division will develop a formal process by which groups inventory work activities, identify and evaluate hazards, develop controls, and authorize work and workers. This process will include mechanisms to directly involve affected workers and address environmental aspects of the work activities.*
- 2. The division will develop and maintain work and hazard inventories.*
- 3. The division will pursue a comprehensive, electronic system for SWP documentation.*
- 4. Managers will review Facility Safety Plans and FTAs as appropriate to communicate the requirements of facility safety envelopes.*

7.3 Environmental Excellence

Laboratory Expectation

Along with worker protection, ISM includes the protection of the environment, waste minimization, and pollution prevention.

ESH Division Expectation

Environmental aspects such as environmental protection, compliance, stewardship, pollution prevention, waste minimization/management, and excellence are integrated into division activities.

ESH Division Actions

Ongoing

- 1. Environmental aspects are emphasized as an integral part of ISM throughout the division during meetings, the division newsletter, and other communication forums.*
- 2. Managers routinely assess environmental aspects during Management Walk-Arounds.*

New

- 1. Managers will explicitly focus on environmental excellence in plans, goals and objectives, and measures.*
- 2. Managers will review existing work activities to ensure that environmental aspects have been considered and controlled.*
- 3. Managers will emphasize that environmental aspects must be considered as part of Facility Work Control and Safe Work Practices.*
- 4. Division members will explicitly address environmental aspects in the identification and evaluation of hazards, in both Facility Work Control and Safe Work Practices.*

8.0 SELF-ASSESSMENT OF PERFORMANCE IN ISM

8.1 Assessing Conformance to Requirements, Goals and Objectives

Laboratory Expectation

In accordance with ISM, the single most important element of performance assurance is self-assessment by individual organizations of performance relative to ES&H requirements, goals and objectives. ISM mandates management walk-arounds and Appendix F self-assessments and expects other self-assessments, as necessary.

ESH Division Expectation

Performance assurance processes, including self-assessments; management walk-arounds; setting of goals, objectives, and measures; tracking/analysis of incidents, goals and objectives, and measures; and lessons-learned are used to assess conformance to requirements, goals, and measures.

ESH Division Actions

Ongoing

- 1. Managers conduct and document management walk-arounds at least three times per quarter.*
- 2. Managers address all walk-around and safety concern actions in a timely manner.*
- 3. Managers assure that findings from assessments and occurrences are addressed in a timely manner. As deemed necessary by managers, actions are documented and tracked to closure.*
- 4. Managers conduct quarterly self-assessments of key Appendix F performance measures.*
- 5. The annual performance appraisal of managers is used to reinforce ES&H requirements, goals, and measures.*

New

- 1. The Laboratory's issue tracking system (ITRAC) will be used throughout the division for tracking significant ES&H corrective actions, issues, and non-conformances.*
- 2. Division-level and group-level goals, objectives, and measures will be developed for internal operations and processes.*
- 3. Division and Laboratory ES&H performance will be broadly communicated to members.*

8.2 Improving Performance

Laboratory Expectation

In addition to self-assessing ES&H performance, ISM requires that self-assessment results are used to evaluate the effectiveness of the organization's safety management structures and processes, and continually improve ES&H performance.

ESH Division Expectation

The Division employs mechanisms to systematically improve ES&H processes and performance.

ESH Division Actions

Ongoing

- 1. Managers use the results of self-assessments and independent audits to identify opportunities for ES&H process improvements.*
- 2. The division (through the Los Alamos Awards Program—LAAP) recognizes outstanding ES&H contributions of its members and colleagues.*

New

- 1. ES&H committees will track, trend, and analyze ES&H performance data. When warranted, the committees will be tasked to evaluate processes and provide recommendations for corrective actions and improvements.*
- 2. The division will designate a specific part of LAAP funds for an annual worker recognition program for ES&H accomplishments.*
- 3. Groups will use their ES&H committees in tracking, trending, analysis, corrective actions, and lessons-learned for their collective incident experience.*
- 4. The division will experiment with identifying and analyzing near-miss incidents and reportable (non-recordable) injuries in a fault-free environment.*

8.3 Lost Workday Cases (LWC), Total Recordable Incidents (TRI), and RCRA Violations

Laboratory Expectation

The Laboratory has adopted LWC and TRI statistics as major indicators of worker safety performance. The Laboratory has also adopted a goal to eliminate all RCRA violations.

ESH Division Expectation

Managers routinely track LWC, TRI, and RCRA violations. Individual and collective incidents are evaluated by managers and ES&H committees, respectively, and actions are taken to preclude recurrences.

ESH Division Actions

Ongoing

- 1. Managers routinely track and trend Lost Workday Cases (LWC), Total Recordable Incidents (TRI) for work-related injuries and illnesses, and Resource Conservation and Recovery Act (RCRA) assessment findings. As necessary, managers analyze root causes of poor performance and take actions to improve performance.*
- 2. Managers elevate the awareness and attention of members regarding the Laboratory's injury/illness and RCRA goals.*
- 3. Division-level management meets with every injured worker and their group-level manager to convey the division's safety value.*

New

- 1. The division will pilot a values- or behavioral-based approach for safety improvement.*
- 2. The division will establish mechanisms, such as a web page indicator or parking lot signs, to display division LWC performance.*
- 3. The division will initiate efforts to emphasize home safety.*